

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

:
: Chapter 9
:
: Case No. 13-53846
:
: Hon. Steven W. Rhodes
:

**CERTIFICATION OF NO OBJECTION TO NATIONAL PUBLIC
FINANCE GUARANTEE CORPORATION'S NOTICE OF RIGHT TO
VOTE THE NATIONAL DWSD BOND CLAIMS**

I, Paul R. Hage, counsel for National Public Finance Guarantee Corporation
("National"), do hereby certify that:

(i) *National Public Finance Guarantee Corporation's Notice of Right to
Vote the National DWSD Bond Claims* [Doc. No. 5025] (the "DWSD Voting
Notice") was filed with the Court on May 23, 2014 pursuant to ¶ 9.a of the *Order
(I) Establishing Procedures For Solicitation And Tabulation Of Votes To Accept
Or Reject Plan Of Adjustment And (II) Approving Notice Procedures Related To
Confirmation Of The Plan Of Adjustment* [Doc. No. 2984] (the "Solicitation
Procedures Order"), as amended by the *Fourth Amended Order Establishing
Procedures, Deadlines And Hearing Dates Relating To The Debtor's Plan Of
Adjustment* [Doc. No. 4202];

(ii) the DWSD Voting Notice advised parties that the deadline to object to the DWSD Voting Notice was June 24, 2014, pursuant to the Solicitation Procedures Order, as amended;

(iii) the DWSD Voting Notice was served electronically using the ECF system, which sent notification of such filing to all ECF participants in this bankruptcy case. *See Certificate of Service* [Doc. No. 5027]);

(iv) the DWSD Voting Notice was also made available on the Balloting Agent's website at:
<http://www.kccllc.net/detroit/document/13538461405230000000000020>;

(v) on June 24, 2014, the Ad Hoc Committee of DWSD Bondholders filed the *Statement Of The Ad Hoc Committee Of DWSD In Response To Insurers' Notices Of Asserted Right To Vote Claims* [Doc. No. 5574], wherein the Ad Hoc Committee stated that, although they disagreed with certain of the assertions made in the DWSD Voting Notice, "each member . . . has agreed that they will not contest the Insurers' rights to vote the DWSD Insured Bond Claims";

(vi) on June 24, 2014, the Ad Hoc Committee of DWSD Bondholders, certain other holders of DWSD Insured Bond Claims, and certain insurers, including National, entered into a stipulation [Doc. No. 5577] whereby each bondholder agreed that (a) it would not contest the Insurers' rights to vote the DWSD Bond Claims, and (b) if the Plan is amended to require resolicitation of the

DWSD Insured Bond Claims, the Stipulation would be of no further effect;

(vii) on June 25, 2014, the Court entered an order approving the above stipulation [Doc. No. 5588];

(viii) no objections or other responses to the DWSD Voting Notice were made or timely filed;

(ix) the deadline for filing an objection to the DWSD Voting Notice has expired; and

(x) paragraph 9.h of the Solicitation Procedures Order provides that if no party “contests a Notice of Asserted Right to Vote a Claim, the Claiming Party [i.e., National] will be granted the relief sought in its Notice of Asserted Right to Vote a Claim.”

WHEREFORE, National respectfully requests that the Court grant the relief requested in the DWSD Voting Notice and enter an order in the form attached as Exhibit 1 to the DWSD Voting Notice and attached hereto as **Exhibit 1**.

Respectfully submitted by:

JAFFE RAITT HEUER & WEISS, P.C.

By: /s/ Paul R. Hage

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Dated: June 30, 2014.

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
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In re:

CITY OF DETROIT, MICHIGAN,

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: Chapter 9
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**ORDER AUTHORIZING NATIONAL PUBLIC FINANCE GUARANTEE
CORPORATION TO VOTE THE NATIONAL DWSD BOND CLAIMS**

This matter coming before the Court on *National Public Finance Guarantee Corporation's Notice of Asserted Right to Vote the National DWSD Bond Claims* (the "Voting Notice"), filed by National Public Finance Guarantee Corporation ("National"); and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. National is the sole party authorized to vote the National DWSD Bond Claims,¹ as set forth in the Voting Notice.
2. National is the sole party authorized to make the election for the National DWSD Bond Claims contemplated by Article II.B.3.a.ii.B of the Plan.

¹ Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Voting Notice.

3. The City shall disregard any votes submitted on the National DWSD Bond Claims by any party other than National.